

IN THE DISTRICT COURT OF COMANCHE COUNTY  
STATE OF OKLAHOMA

JAMES FRANKLIN McLAUGHLIN, III, )

Plaintiff, )

vs. )

BRETT STEVENS, )

Defendant. )

STATE OF OKLAHOMA  
Comanche County  
FILED in the  
Office of the Court Clerk

APR 04 2022

Case No. CJ-~~2022~~  
Deputy



PETITION

Comes now the Plaintiff, James Franklin McLaughlin, III (hereinafter called McLaughlin) and for his claims against the Defendant, Brett Stevens, alleges and states:

FIRST CAUSE OF ACTION

1. On or about December 6, 2021 at a house located at 4706 SE Avalon Avenue, Lawton, Oklahoma in the County of Comanche, the Defendant, Brett Stevens, without the consent of McLaughlin acted either with the intent of making a harmful/offensive contact with the person of McLaughlin, or with the intent of putting McLaughlin in apprehension of such a contact. Further, Defendant Brett Stevens acts resulted in harmful/offensive contact with McLaughlin.

2. As a result of the Defendant, Brett Stevens conduct McLaughlin has suffered damages including punitive damages for the intentional and reckless conduct of Defendant, Brett Stevens.

**SECOND CAUSE OF ACTION**

3. Plaintiff realleges and readopts Paragraphs 1 and 2 contained in the First Cause of Action.


4. The Defendant, Brett Stevens' actions in the setting in which they occurred were so extreme and outrageous as to go beyond all possible bounds of decency and would be considered atrocious and utterly intolerable in a civilized society and Defendant, Brett Stevens intentionally or recklessly caused severe emotional distress to McLaughlin beyond that which a reasonable person could be expected to endure.

5. As a result of Defendant, Brett Stevens conduct, McLaughlin has suffered damages including punitive damages for the intentional and reckless conduct of Defendant, Brett Stevens.

WHEREFORE, the Plaintiff demands judgment against the Defendant in an amount in excess of Seventy-Five Thousand Dollars (\$75,000.00) with the exact amount to be determined by the jury, and for punitive damages in an amount in excess of Seventy-Five Thousand Dollars (\$75,000.00) with the exact amount to be determined by the jury; together with such interest and costs, as may be provided by law, and/or such other relief as the Court deems appropriate.

**Respectfully Submitted,**

**ZELBST, HOLMES & BUTLER**

  
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